

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

1. MOHAMMED OMAR,

Plaintiff,

v.

1. BRITTEN PRODUCTIONS, LLC, a Foreign  
for Profit Limited Liability Corporation,  
2. WOODLAND HILLS MALL, LLC, a Foreign  
for Profit Limited Liability Company, and  
3. SIMON PROPERTY GROUP, INC., a Foreign  
for Profit Corporation,

Defendants.

Case No. 4:22-cv-00204-GKF-SH

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1441(a) and (b) and 28 U.S.C. § 1332, Defendant Britten Productions, LLC (“the Defendant” and/or “Britten”) files this Notice of Removal.

1. Plaintiff Omar Mohammed filed his Petition on January 27, 2022, against Britten, Woodland Hills Mall, LLC (“Woodland Hills”) and Simon Property Group, Inc. (“Simon”), in the District Court for Tulsa County, Oklahoma, case number CJ-2022-278 (“the original State Court Action”). The Petition alleges Plaintiff suffered personal injuries resulting from an incident at Woodland Hills Mall located in Tulsa County on March 6, 2022. In his Petition, Plaintiff asserts a cause of action for negligence as to all defendants, a cause of action for premises liability as to Woodland Hills and Simon, and he seeks actual and compensatory damages in excess of \$75,000.

2. Upon information and belief, Plaintiff is a citizen of Oklahoma and maintains a residence in fact with the intent to remain indefinitely in the State of Oklahoma. For these reasons, Plaintiff is a domiciled person in the State of Oklahoma and is a citizen of the State of Oklahoma.

3. Upon information and belief, Britten is a foreign limited liability company doing business in Tulsa County, State of Oklahoma, with a principal place of business in the State of Michigan. Britten is organized under the laws of the State of Michigan, and its sole member and manager is a resident of Michigan. For these reasons, Britten is a citizen of the State of Michigan.

4. Upon information and belief, Woodland Hills is a foreign limited liability company doing business in Tulsa County, State of Oklahoma, with a principal place of business in the State of Indiana. Woodland Hills is organized under the laws of the State of Indiana, with no members that are residents of the State of Oklahoma. For these reasons, Woodland Hills is a citizen of the State of Indiana.

5. Upon information and belief, Simon is a foreign for-profit corporation doing business in Tulsa County, State of Oklahoma, with a principal place of business in the State of Indiana. Simon is organized under the laws of the State of Indiana and is a citizen of the State of Indiana.

6. This Court has subject matter jurisdiction, as plaintiff is a citizen of the State of Oklahoma, but no defendant is a citizen of Oklahoma. Therefore, there is complete diversity among the parties to this action, and original jurisdiction pursuant to 28 U.S.C. § 1332 exists.

7. No other defendant has been served that would need to consent to the removal of this action.

8. The following is a complete list of the process, pleadings and orders served and/or filed in the original State Court Action:

- |    |           |   |
|----|-----------|---|
| a. | Exhibit 1 | Petition  |
| b. | Exhibit 2 | Notice for Service of Summons on Britten Productions, LLC   |
| c. | Exhibit 3 | Notice for Service of Summons on Simon Property Group, Inc. |
| d. | Exhibit 4 | Notice for Service of Summons on Woodland Hills Mall, LLC   |
| e. | Exhibit 5 | Entry of Appearance for Britten by Dan S. Folluo            |

- f. Exhibit 6 Entry of Appearance for Britten by Michael D. Goss
- g. Exhibit 7 Entry of Appearance for Britten by D. Folluo and M. Goss
- h. Exhibit 8 Defendant Britten Production LLC's Answer to the Petition

9. A copy of the docket sheet for the subject State Court Action is attached as Exhibit 9.

10. Contemporaneously with the filing of this Notice of Removal, Defendant Britten will file a copy of this Notice of Removal with the District Court of Tulsa County, Oklahoma. Defendant Britten will also provide Plaintiff a copy of this Notice of Removal.

11. Plaintiff demanded a jury trial in his Petition. Defendant Britten also demands jury trial on all issues.

Respectfully submitted:

/s/ Michael D. Goss

DAN S. FOLLUO, OBA# 11303

[dfolluo@rhodesokla.com](mailto:dfolluo@rhodesokla.com)

MICHAEL D. GOSS, OBA# 16759

[mgoss@rhodesokla.com](mailto:mgoss@rhodesokla.com)

RHODES, HIERONYMUS, JONES,  
TUCKER & GABLE

P.O. Box 21100

Tulsa, Oklahoma 74121-1100

(918) 582-1173

(918) 592-3390 Facsimile

**ATTORNEYS FOR DEFENDANT,  
BRITTEN PRODUCTIONS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6<sup>th</sup> day of May 2022, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and sent the document to ECF Registrants and counsel for the Plaintiff as set forth below:

Charles L. Richardson, OBA #13388  
Wiley K. Anderson, OBA #33718  
RICHARDSON RICHARDSON BOUDREAUX  
7447 South Lewis Avenue  
Tulsa, Oklahoma 74136  
**Attorneys for Plaintiff**

/s/ Michael D. Goss